

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE**

GEORGE A. MENOLD, Individually and On  
Behalf of All Others Similarly Situated,

Plaintiff,

v.

NAVIENT CORPORATION, JOHN F.  
REMONDI, and SOMSAK CHIVAVIBUL,

Defendants.

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TORE HEINZ MARKUS JAGRELIUS,  
Individually and On Behalf of All Others  
Similarly Situated,

Plaintiff,

v.

NAVIENT CORPORATION, JOHN F.  
REMONDI, and SOMSAK CHIVAVIBUL,

Defendants.

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POLICEMEN'S ANNUITY & BENEFIT  
FUND OF CHICAGO, Individually and On  
Behalf of All Others Similarly Situated,

Plaintiff,

v.

NAVIENT CORPORATION, JOHN F.  
REMONDI, JOHN KANE, SOMSAK  
CHIVAVIBUL, WILLIAM M.  
DIEFENDERFER, III, ANN TORRE BATES,  
DIANE SUITT GILLELAND, LINDA  
MILLS, BARRY A. MUNITZ, STEVEN L.  
SHAPIRO, JANE J. THOMPSON, BARRY L.  
WILLIAMS, CREDIT SUISSE SECURITIES  
(USA) LLC, DEUTSCHE BANK

Case No. 1:16-cv-00075-GMS

**CLASS ACTION**

Case No. 1:16-cv-00084-GMS

**CLASS ACTION**

Case No. 1:16-cv-00112-GMS

**CLASS ACTION**

SECURITIES INC., J.P. MORGAN  
SECURITIES LLC, RBC CAPITAL  
MARKETS, LLC, BARCLAYS CAPITAL  
INC., GOLDMAN, SACHS & CO.,  
MERRILL LYNCH, PIERCE, FENNER &  
SMITH INCORPORATED, RBS  
SECURITIES INC., AND WELLS FARGO  
SECURITIES, LLC,

Defendants.

**AVERMENT OF COUNSEL IN ACCORDANCE WITH LOCAL RULE 7.1.1**

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Joy A. Kruse\*

Daniel P. Chiplock\*

Michael J. Miarmi\*

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\* *Pro hac vice* application forthcoming

[Additional counsel listed on signature page]

Dated: April 11, 2016

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*Liaison Counsel for the Lord Abbett Funds and  
Proposed Liaison Counsel for the Class*

To the extent Local Rule 7.1.1 applies, the undersigned, one of the attorneys for movants Lord Abbett Affiliated Fund, Inc., Lord Abbett Equity Trust – Lord Abbett Calibrated Mid Cap Value Fund, Lord Abbett Bond Debenture Fund, Inc., and Lord Abbett Investment Trust – Lord Abbett High Yield Fund (collectively, the “Lord Abbett Funds”) hereby states that the statutory deadline for putative class members to move the Court for appointment as lead plaintiff in accordance with 15 U.S.C. § 78u- 4(a)(3)(A)(ii) has not yet passed and therefore movants are unable to identify potentially opposing parties prior to the filing of this motion. Accordingly, the Lord Abbett Funds respectfully request that the requirements of Local Rule 7.1.1 be deemed to have been satisfied here.

Dated: April 11, 2016

Respectfully submitted,

**LIEFF CABRASER HEIMANN  
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\* *Pro hac vice* application forthcoming